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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**

12 KEITH THOMAS, RICHARD HAYES, HERB
13 SMITH, and OKLAHOMA POLICE PENSION &
14 RETIREMENT SYSTEM,

15 Plaintiffs,

16 v.

17 MAGNACHIP SEMICONDUCTOR CORP. SANG
18 PARK, TAE YOUNG HWANG, MARGARET
19 SAKAI, R. DOUGLAS NORBY, ILBOK LEE,
20 NADER TAVAKOLI, RANDAL KLEIN,
21 MICHAEL ELKINS, AVENUE CAPITAL
22 MANAGEMENT II, L.P., BARCLAYS CAPITAL
23 INC., DEUTSCHE BANK SECURITIES INC.,
24 CITIGROUP GLOBAL MARKETS INC., UBS
25 SECURITIES LLC and NEEDHAM & COMPANY,
26 LLC,

27 Defendants.

28 CASE NO.: 3:14-cv-01160-JST

1 **STIPULATION REGARDING
2 PROTECTIVE ORDER ON
3 CONFIDENTIALITY**

4 **WHEREAS**, on February 8, 2016, this Court entered a Stipulated Protective
5 Order on Confidentiality (“Protective Order”), ECF No. 187, to which Lead Plaintiff and
6 MagnaChip Semiconductor Corp. (“MagnaChip”) were signatories;

7 **WHEREAS**, Michael Elkins (“Elkins”) was not a signatory to the Protective
8 Order;

9 **WHEREAS**, Lead Plaintiff and Elkins agree that the terms of the Protective
10 Order should apply to all discovery in this matter between Lead Plaintiff and Elkins;

1 **IT IS THEREFORE STIPULATED THAT:**

2 All discovery in this matter between Lead Plaintiff and Elkins shall be governed
3 by, and conducted pursuant to, the terms of the Protective Order.

4 Dated: October 11, 2016

5 POMERANTZ LLP

6 AKIN GUMP STRAUSS HAUER & FELD
7 LLP

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27 *Attorneys for Michael Elkins*

28 *Lead Counsel for the Class*

1 **CERTIFICATION OF CONCURRENCE FROM OTHER PARTIES**

2 I, John C. Murphy, am the ECF User whose ID and password are being used to file this
3 STIPULATION REGARDING PROTECTIVE ORDER ON CONFIDENTIALITY. In
4 compliance with Civil L.R. 5-1(i)(3), I hereby attest that the other signatory has concurred in this
5 filing.

6 _____
7 /s/ *John C. Murphy*
John C. Murphy

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10 **IT IS SO ORDERED.**

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12 Dated: October 11, 2016

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Honorable Jon S. Tigar
United States District Judge